UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION	Master File No. 12-md-02311 Honorable Marianne O. Battani
In Re: Instrument Panel Clusters	2:12-cv-00200
In Re: Fuel Senders	2:12-cv-00300
In Re: Heater Control Panels	2:12-cv-00400
In Re: Alternators	2:13-cv-00700
In Re: Windshield Wipers	2:13-cv-00900
In Re: Radiators	2:13-cv-01000
In Re: Starters	2:13-cv-01100
In Re: Ignition Coils	2:13-cv-01400
In Re: Motor Generators	2:13-cv-01500
In Re: HID Ballasts	2:13-cv-01700
In Re: Inverters	2:13-cv-01800
In Re: Fuel Injection Systems	2:13-cv-02200
In Re: Power Window Motors	2:13-cv-02300
In Re: Automatic Transmission Fluid Warmers	2:13-cv-02400
In Re: Valve Timing Control Devices	2:13-cv-02500
In Re: Air Conditioning Systems	2:13-cv-02700
In Re: Windshield Washer Systems	2:13-cv-02800
In Re: Spark Plugs	2:15-cv-03000
In Re: Ceramic Substrates	2:16-cv-03800

This Document Relates to:
All Actions

DEFENDANTS' MOTION TO SEAL (IN PART)
CERTAIN DOCUMENTS FILED UNDER SEAL

Defendants hereby move for leave to seal (in part) certain documents that the parties previously filed under seal in the above-captioned actions.

1. In support of this motion, Defendants rely on the accompanying memorandum of law, which Defendants incorporate by reference herein.

2. As Local Rule 7.1(a) requires, counsel for Defendants sought concurrence from Plaintiffs regarding this motion. Defendants informed Plaintiffs on a meet-and-confer teleconference on October 13, 2016 that they intended to seek relief keeping portions of these documents under seal. Plaintiffs did not raise any concerns about the relief that Defendants seek.

Respectfully submitted,

Dated: January 26, 2017

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MEMORANDUM OF LAW IN SUPPORT OF
DEFENDANTS' MOTION TO SEAL (IN PART)
CERTAIN DOCUMENTS FILED UNDER SEAL

STATEMENT OF THE ISSUES PRESENTED

Should the Court, consistent with its prior rulings, allow portions of certain documents that the parties previously filed under seal to remain under seal on the grounds that the information sought to be kept under seal implicates the privacy interests of non-party individuals?

Answer: Yes.

The undersigned Defendants in later-filed actions respectfully file this Motion and adopt and incorporate the arguments asserted in *Wire Harnesses* Defendants' Motion to Seal (In Whole or In Part) Certain Documents Previously Filed Under Seal, 2:12-cv-00101-MOB-MKM, ECF No. 399 (Jan. 26, 2017) with respect to names of non-party individuals who were not indicted by the Department of Justice ("DoJ").

As the Court has previously ruled, to protect the privacy interests of non-parties, the names and identifying information of certain individuals identified in a previously filed document should remain under seal. *See* Order Granting DENSO Corporation and DENSO International America, Inc.'s Motion to Maintain Certain Information Under Seal, 2:12-cv-00101-MOB-MKM, ECF No. 366 (Dec. 28, 2016). Public disclosure of the names of these non-parties who were not indicted by the DoJ would cause unnecessary embarrassment, and could result in reputational or professional harm for these individuals, and there is no public interest in the disclosure of these individuals' names. For these reasons, and the reasons articulated in the *Wire Harnesses* Defendants' Motion, the Court should maintain under seal the names of unindicted individuals contained in the following documents:

- 2:12-md-02311-MOB-MKM, ECF No. 1162, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:12-cv-00202-MOB-MKM, ECF No. 30, Automobile Dealers Consolidated Class Complaint
- 2:12-cv-00202-MOB-MKM, ECF No. 89, Dealership Plaintiffs' Second Consolidated Class Complaint
- 2:12-cv-00202-MOB-MKM, ECF No. 142, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:12-cv-00203-MOB-MKM, ECF No. 132, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:12-cv-00302-MOB-MKM, ECF No. 40, Dealership Consolidated Class Complaint
- 2:12-cv-00302-MOB-MKM, ECF No. 111, Dealership Second Consolidated Class Complaint
- 2:12-cv-00302-MOB-MKM, ECF No. 144, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints

- 2:12-cv-00303-MOB-MKM, ECF No. 107, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:12-cv-00402-MOB-MKM, ECF No. 180, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:12-cv-00403-MOB-MKM, ECF No. 137, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-00702-MOB-MKM, ECF No. 52, Consolidated Amended Class Action Complaint
- 2:13-cv-00702-MOB-MKM, ECF No. 59, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-00703-MOB-MKM, ECF No. 41, Consolidated Amended Class Action Complaint
- 2:13-cv-00703-MOB-MKM, ECF No. 57, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-00703-MOB-MKM, ECF No. 116, Second Consolidated Amended Class Action Complaint
- 2:13-cv-00703-MOB-MKM, ECF No. 118, Second Consolidated Amended Class Action Complaint
- 2:13-cv-00902-MOB-MKM, ECF No. 32, Dealership Consolidated Class Complaint
- 2:13-cv-00902-MOB-MKM, ECF No. 48, Dealership Consolidated Class Complaint
- 2:13-cv-00902-MOB-MKM, ECF No. 86, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-00903-MOB-MKM, ECF No. 46, Consolidated Amended Class Action Complaint
- 2:13-cv-00903-MOB-MKM, ECF No. 60, Corrected Consolidated Amended Class Action Complaint
- 2:13-cv-00903-MOB-MKM, ECF No. 109, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-01002-MOB-MKM, ECF No. 98, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-01003-MOB-MKM, ECF No. 108, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-01102-MOB-MKM, ECF No. 50, Consolidated Amended Class Action Complaint
- 2:13-cv-01102-MOB-MKM, ECF No. 57, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-01103-MOB-MKM, ECF No. 51, Consolidated Amended Class Action Complaint

- 2:13-cv-01103-MOB-MKM, ECF No. 73, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-01103-MOB-MKM, ECF No. 134, Second Consolidated Amended Class Action Complaint
- 2:13-cv-01103-MOB-MKM, ECF No. 136, Second Consolidated Amended Class Action Complaint
- 2:13-cv-01402-MOB-MKM, ECF No. 54, Consolidated Amended Class Action Complaint
- 2:13-cv-01402-MOB-MKM, ECF No. 63, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-01403-MOB-MKM, ECF No. 40, Consolidated Amended Class Action Complaint
- 2:13-cv-01403-MOB-MKM, ECF No. 56, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-01502-MOB-MKM, ECF No. 73, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-01503-MOB-MKM, ECF No. 65, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-01702-MOB-MKM, ECF No. 142, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-01703-MOB-MKM, ECF No. 122, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-01802-MOB-MKM, ECF No. 14, Dealership Consolidated Class Complaint
- 2:13-cv-01802-MOB-MKM, ECF No. 43, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-01803-MOB-MKM, ECF No. 18, Consolidated Amended Class Action Complaint
- 2:13-cv-01803-MOB-MKM, ECF No. 58, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-02200-MOB-MKM, ECF No. 66, Defendant Mikuni Corporation and Mikuni America Corporation's Motion to Dismiss the Consolidated Amended Complaints
- 2:13-cv-02202-MOB-MKM, ECF No. 23, Dealership Consolidated Class Complaint
- 2:13-cv-02202-MOB-MKM, ECF No. 32, Dealership Consolidated Class Complaint
- 2:13-cv-02202-MOB-MKM, ECF No. 69, End-Payor and Automobile Dealer Plaintiffs' Memorandum of Law In Opposition to Mitsuba Corporation and American Mitsuba Corporation's Motion to Dismiss the Consolidated Class Action Complaints
- 2:13-cv-02202-MOB-MKM, ECF No. 146, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-02202-MOB-MKM, ECF No. 121, Sealed Opinion and Order Denying Defendant Keihin North America's Motion to Dismiss

- 2:13-cv-02202-MOB-MKM, ECF No. 130, Answer and Affirmative Defenses of Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., and Mitsubishi Electric Automotive America, Inc. to Dealership Plaintiffs' Consolidated Amended Class Action Complaint
- 2:13-cv-02202-MOB-MKM, ECF No. 136, Answer and Additional Defenses of Aisan Industry Co., Ltd., Aisan Corporation of America, Franklin Precision Industry, Inc. and Hyundam Industrial Co., Ltd. to Dealership Consolidated Class Complaint
- 2:13-cv-02202-MOB-MKM, ECF No. 190, Automobile Dealership Plaintiffs' Brief in Opposition to Defendant Keihin Corporation's Motion to Dismiss the Dealership Consolidated Class Complaint
- 2:13-cv-02203-MOB-MKM, ECF No. 19, Consolidated Amended Class Action Complaint
- 2:13-cv-02203-MOB-MKM, ECF No. 28, Corrected Consolidated Amended Class Action Complaint
- 2:13-cv-02203-MOB-MKM, ECF No. 64, End-Payor and Automobile Dealer Plaintiffs' Memorandum of Law In Opposition to Mitsuba Corporation and American Mitsuba Corporation's Motion to Dismiss the Consolidated Class Action Complaints
- 2:13-cv-02203-MOB-MKM, ECF No. 124, End-Payor Plaintiffs' Brief in Opposition to Defendant Keihin Corporation's Motion to Dismiss the Corrected Consolidated Amended Class Action Complaint
- 2:13-cv-02203-MOB-MKM, ECF No. 136, Sealed Opinion and Order Denying Defendant Keihin North America's Motion to Dismiss
- 2:13-cv-02203-MOB-MKM, ECF No. 149, Answer and Affirmative Defenses of Mitsubishi Electric Corporation, Mitsubishi Electric US Holdings, Inc., and Mitsubishi Electric Automotive America, Inc. to End-Payor Plaintiffs' Corrected Consolidated Amended Class Action Complaint
- 2:13-cv-02203-MOB-MKM, ECF No. 156, Answer and Additional Defenses of Aisan Industry Co., Ltd., Aisan Corporation of America, Franklin Precision Industry, Inc. and Hyundam Industrial Co., Ltd. to End-Payor Plaintiffs' Corrected Consolidated Amended Class Action Complaint
- 2:13-cv-02203-MOB-MKM, ECF No. 167, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-02203-MOB-MKM, ECF No. 177, Sealed Opinion and Order Denying Defendant Keihin Corporation's Motion to Dismiss
- 2:13-cv-02302-MOB-MKM, ECF No. 61, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-02303-MOB-MKM, ECF No. 69, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-02402-MOB-MKM, ECF No. 19, Consolidated Amended Class Action Complaint
- 2:13-cv-02402-MOB-MKM, ECF No. 27, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints

- 2:13-cv-02403-MOB-MKM, ECF No. 17, Consolidated Amended Class Action Complaint
- 2:13-cv-02403-MOB-MKM, ECF No. 29, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-02500-MOB-MKM, ECF No. 51, Defendant Mikuni Corporation and Mikuni America Corporation's Motion to Dismiss the Consolidated Amended Complaints
- 2:13-cv-02502-MOB-MKM, ECF No. 22, Dealership Consolidated Class Complaint
- 2:13-cv-02502-MOB-MKM, ECF No. 32, Dealership Consolidated Class Complaint
- 2:13-cv-02502-MOB-MKM, ECF No. 110, Answer and Affirmative Defenses of Mitsubishi Electric Corporation and Mitsubishi Electric Automotive America, Inc. to Dealership Plaintiffs' Consolidated Amended Class Action Complaint
- 2:13-cv-02502-MOB-MKM, ECF No. 118, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-02503-MOB-MKM, ECF No. 19, Consolidated Amended Class Action Complaint
- 2:13-cv-02503-MOB-MKM, ECF No. 30, Corrected Consolidated Amended Class Action Complaint
- 2:13-cv-02503-MOB-MKM, ECF No. 53, Second Corrected Consolidated Amended Class Action Complaint
- 2:13-cv-02503-MOB-MKM, ECF No. 104, Answer and Affirmative Defenses of Mitsubishi Electric Corporation and Mitsubishi Electric Automotive America, Inc. to End-Payor Plaintiffs' Second Corrected Consolidated Amended Class Action Complaint
- 2:13-cv-02503-MOB-MKM, ECF No. 109, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-02702-MOB-MKM, ECF No. 27, Consolidated Amended Class Action Complaint
- 2:13-cv-02702-MOB-MKM, ECF No. 30, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-02703-MOB-MKM, ECF No. 31, Consolidated Class Action Complaint
- 2:13-cv-02703-MOB-MKM, ECF No. 38, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-02802-MOB-MKM, ECF No. 60, Exhibit A to Automobile Dealer Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:13-cv-02803-MOB-MKM, ECF No. 58, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints
- 2:14-cv-14721-MOB-MKM, ECF No. 5, Dealership Consolidated Class Complaint
- 2:15-cv-00707-MOB-MKM, ECF No. 14, Truck and Equipment Dealers First Amended Class Action Complaint
- 2:15-cv-03003-MOB-MKM, ECF No. 6, Declaration of Steven N. Williams In Support of End-Payor Plaintiffs' Notice of Motion and Motion to Consolidate Claims and Amend Complaints

- 2:15-cv-14096-MOB-MKM, ECF No. 27, Truck and Equipment Dealers First Amended Class Action Complaint
- 2:15-cv-11868-MOB-APP, ECF No. 2, Class Action Complaint for Damages and Injunctive Relief
- 2:15-cv-13465-MOB-MKM, ECF No. 2, Class Action Complaint for Damages and Injunctive Relief
- 2:16-cv-11804-MOB, MKM, ECF No. 2, Class Action Complaint for Damages and Injunctive Relief
- 2:16-cv-12194-MOB-MKM, ECF No. 2, Class Action Complaint for Damages and Injunctive Relief

Accordingly, Defendants respectfully request that this Court grant Defendants' motion and allow the limited portions of these documents that are the subject of the motion to remain under seal.

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Dated: January 26, 2017

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION	Master File No. 12-md-02311 Honorable Marianne O. Battani
In Re: Instrument Panel Clusters	2:12-cv-00200
In Re: Fuel Senders	2:12-cv-00300
In Re: Heater Control Panels	2:12-cv-00400
In Re: Alternators	2:13-cv-00700
In Re: Windshield Wipers	2:13-cv-00900
In Re: Radiators	2:13-cv-01000
In Re: Starters	2:13-cv-01100
In Re: Ignition Coils	2:13-cv-01400
In Re: Motor Generators	2:13-cv-01500
In Re: HID Ballasts	2:13-cv-01700
In Re: Inverters	2:13-cv-01800
In Re: Fuel Injection Systems	2:13-cv-02200
In Re: Power Window Motors	2:13-cv-02300
In Re: Automatic Transmission Fluid Warmers	2:13-cv-02400
In Re: Valve Timing Control Devices	2:13-cv-02500
In Re: Air Conditioning Systems	2:13-cv-02700
In Re: Windshield Washer Systems	2:13-cv-02800
In Re: Spark Plugs	2:15-cv-03000
In Re: Ceramic Substrates	2:16-cv-03800

This Document Relates to:
All Actions

CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2017, I caused the foregoing Defendants' Motion to Seal (In Part) Certain Documents Filed Under Seal to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notifications of such filings to all counsel of record.

Dated: January 26, 2017

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